

# EXHIBIT A

LAW OFFICE OF THOMAS M. HARVEY

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June 22, 2022

Marcus Gordon, M.D.  
Four Women Health Services, LLC  
150 Emory Street, #2  
Attleboro, MA 02703

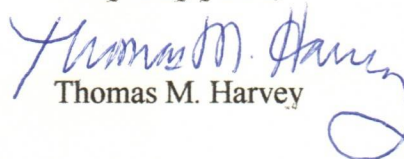
Re: Attleboro Women's Health Center

Dear Dr. Gordon:

I represent the Attleboro Women's Health Center. It has come to my attention that it appears that members of your staff at Four Women Health Services, LLC, have engaged in illegal and libelous activities regarding the Attleboro Women's Health Center. Specifically, these actions include mail tampering, trespass, harassing phone calls, and libelous Google reviews and Facebook posts.

You are hereby forewarned. If there is one more incidence of this type of activity, then the Attleboro Women's Health Center will file the appropriate criminal and / or civil action against you and Four Women Health Services. Further, pursuant to G.L. Ch. 93A, Sec. 11, the Attleboro Women's Health Center will be seeking recovery of multiple damages and its reasonable attorneys' fees in compensation for your unfair business practices.

Very truly yours,

  
Thomas M. Harvey



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August 16, 2022

**Via E-mail**

Thomas M. Harvey  
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Arlington, MA 02476  
tharveyesq@aol.com

Re: Your June 22, 2022 Letter on Behalf of Attleboro Women's Health Center

Dear Mr. Harvey,

I am writing on behalf of Four Women Health Services, LLC ("Four Women") in response to your letter sent on June 22, 2022 on behalf of Attleboro Women's Health Center ("AWHC"). In your letter, you accused Four Women of engaging in a variety of actions you characterized as "illegal and libelous." This accusation is wholly unfounded: Four Women has not engaged in any of the activities enumerated in your letter nor any conduct that could amount to a violation of applicable law.

Your letter fails to identify any specific information associated with the conduct alleged therein. Your broad claim that Four Women has engaged in activity potentially warranting legal sanction appears calculated to harass, rather than address any legitimate concerns held by AWHC. If you have evidence of specific incidents related to any of the activity described in your letter, I encourage you to provide this information to me at Foley Hoag LLP. In the meantime, however, Four Women has assessed and investigated your generalized assertions and denies them in full.

Four Women has provided essential reproductive health care to its patients for almost 25 years and always seeks to ensure that its patients are able to obtain Four Women's services in a safe environment. Four Women understands well the harm that harassment, threats, and misinformation can cause to patients seeking sensitive and critical health services. To this end, Four Women prioritizes not only complying with all applicable law, but also maintaining a peaceful presence in the community to protect its patients. Four Women hopes that its neighbors follow similar principles.

Thomas M. Harvey  
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Should you wish to discuss this matter further, please direct all future correspondence to me.

Cordially,

*Martha Coakley*

Of Counsel

CC: Caroline Donovan, Esq.  
Emily Nash, Esq.